Issue Statement

Delisting of Grizzly Bears in the Greater Yellowstone Area

The population of grizzly bears in the Greater Yellowstone Area (GYA) was rapidly declining by 1975 when the species was appropriately listed as "threatened" under the newly enacted Endangered Species Act (ESA). In the ensuing 35 years, state and federal resource managers and researchers worked cooperatively to develop a framework for recovery and have implemented that framework in the GYA more successfully and completely than in the other five recovery areas identified in the national Grizzly Bear Recovery Plan. As mandated by the ESA, the recovery plan for GYA grizzly bears identified population and habitat management goals that would define recovery and permit delisting when achieved. Cooperative efforts by state and federal resource management agencies also resulted in development of a Conservation Strategy that identified important habitat protections, regulatory mechanisms, monitoring, and research designed to ensure continued security of a delisted grizzly bear population in the GYA. The Conservation Strategy includes habitat protections on U.S. Forest Service lands that were adopted in a package of forest plan revisions for the six national forests surrounding Yellowstone National Park.

The Conservation Strategy provides high levels of habitat security for grizzly bears in a core area of 5.9 million acres centered on Yellowstone National Park; this was the original recovery area identified in the Recovery Plan. In addition to this core area, the Conservation Strategy significantly expanded the geographic extent for post-delisting conservation efforts to include surrounding national forest and other lands as a buffer zone around the core. In this buffer zone, the Conservation Strategy provides protections that are not as high as in the core area but still provide significant additional security for the recovered population. The Conservation Strategy also includes grizzly bear management plans that have been adopted by state and tribal wildlife agencies in Montana, Wyoming, and Idaho. The U.S. Fish and Wildlife Service (FWS) determined that these state plans represented adequate regulatory mechanisms to ensure that recovery would continue subsequent to delisting. The Conservation Strategy and the state plans represent a conservative framework that ensures sustainable grizzly bear management after delisting.

This framework has been informed by an exceptionally high level of collaborative research coordinated by the Interagency Grizzly Bear Committee (IGBC), and its member agencies, as well as the scientific role of the Interagency Grizzly Bear Study Team. The Yellowstone grizzly bear is likely one of the most studied and monitored wildlife populations on earth and the best understood of any bear population. Even with this exceptional level of information, however, it is not possible to predict with certainty what the impacts of future events might have on this population of grizzly bears, other wildlife, or their habitats.

The grizzly bear is a generalist omnivore, able to live in a wide array of habitat types with differing and unpredictable levels of food availability. Correspondingly, grizzly bears are likely to better adapt to loss of specific food sources caused by environmental changes than more specialist species. Wildlife managers deal with such fluctuations for bears and other species by monitoring populations, monitoring habitat conditions and, where necessary, responding to observed changes with adaptive management. The Conservation Strategy identified specific monitoring programs for delisted grizzly bears in the GYA that should detect significant changes in either populations or habitat should they occur as a consequence of climate change or other uncertainties such as declines or loss of whitebark pine seeds as a food source. Managers can then make appropriate changes in conservation strategies. Removing ESA protection for a species does not require identification of guaranteed effective responses for all future scenarios. This would represent an insurmountable barrier for delisting any species and would violate the intent of the ESA to delist species once biologically sound recovery targets are achieved.

As a result of on-the-ground implementation of the Recovery Plan and the Conservation Strategy by all cooperators, population size, distribution, and mortality targets have been consistently met. In fact, this bear population exceeds all targets in the recovery plan. From an abundance standpoint, the minimum requirement of 48 different females with newborn cubs per year has been met. The total population was estimated to be 602 bears as of 2010, which is more than twice the 250 bears estimated to reside in the GYA at the time of listing in 1975. The annual distribution target has been met each year since 1998. Lastly, mortality thresholds in the Recovery Plan for independent females have only been exceeded in 3 of the past 25 years and during the same time period (1986–2010) the GYA grizzly bear population grew at an average rate of about 4 percent per year.

Grizzly bear management and research efforts in the GYA have become a model for state and federal agency cooperation and for how the development and application of sound science can reverse the decline of even a controversial species with large landscape-level habitat requirements. Because management targets, as set forth in the recovery plan, are being consistently met and adequate plans to manage grizzly bears post-delisting are in place, it is the policy of The Wildlife Society regarding the Greater Yellowstone Area population of grizzly bears to:

- 1. Endorse the U.S. Fish and Wildlife Service proposal to remove the grizzly bear population in the GYA from the list of species protected under the Endangered Species Act so long as recovery targets continue to be met and demographic rate thresholds are maintained.
- 2. Endorse state grizzly bear management plans that specify the grizzly bear will continue to colonize and occupy suitable habitats and commit to keeping grizzly bear mortalities below quotas established by the Interagency Grizzly Bear Study Team.
- 3. Urge involved agencies to continue to follow management and monitoring protocols outlined in the Conservation Strategy and to demonstrate that species can be successfully removed from the list of threatened and endangered species.

- 4. Endorse the review mechanisms in the Conservation Strategy which identify if grizzly bears in the GYA should be relisted because of substantial declines in the population through loss of currently used foods such as whitebark pine seeds (during years these seeds are available), excessive mortalities, or other reasons.
- 5. Urge the U.S. Fish and Wildlife Service to focus renewed attention on the other five grizzly bear recovery areas in the United States because without progress in these other recovery areas, the GYA population will remain isolated. Where appropriate, the Service should apply the successful model that has resulted in recovery of the grizzly bear in the GYA to other recovery areas.
- 6. Recognize the vitally important role the ESA plays in maintaining biodiversity within the United States as evidenced by successful implementation of the Act in recovering the grizzly bear in the Greater Yellowstone Area.
- 7. Endorse the general principle that, on biological issues, it is appropriate for the legal system to defer to the expertise of agency biologists absent compelling reasons for not doing so.

The Wildlife Society's **Position Statement on <u>The U.S. Endangered Species Act</u>** states that the Society's policy is to "Assure that decisions under the ESA are transparent, replicable, and based on robust analyses of the best scientific data available (TWS 2017).